

1 Matthew I. Knepper, Esq.
2 Nevada Bar No. 12796
3 Miles N. Clark, Esq.
4 Nevada Bar No. 13848
5 KNEPPER & CLARK LLC
6 5510 So. Fort Apache Rd, Suite 30
7 Las Vegas, NV 89148
8 Phone: (702) 856-7430
9 Fax: (702) 447-8048
10 Email: matthew.knepper@knepperclark.com
11 Email: miles.clark@knepperclark.com

12 David H. Krieger, Esq.
13 Nevada Bar No. 9086
14 HAINES & KRIEGER, LLC
15 8985 S. Eastern Ave., Suite 350
16 Henderson, NV 89123
17 Phone: (702) 880-5554
18 Fax: (702) 385-5518
19 Email: dkrieger@hainesandkrieger.com

20 *Attorneys for Plaintiff*

21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF NEVADA**

23 DAVID S. OGBURN,

24 Case No.: 2:19-cv-00580-JAD-GWF

25 Plaintiff,

vs.

26 TRANS UNION LLC; and RUSHMORE
27 LOAN MANAGEMENT SERVICES,

28 Defendants.

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO MOTION TO DISMISS**

[FIRST REQUEST]

29 Plaintiff David S. Ogburn (“Plaintiff”), by and through his counsel of record, and
30 Defendant Trans Union LLC (“Trans Union”) have agreed and stipulated to the following:

31 1. On April 5, 2019, Plaintiff filed a Complaint [ECF Dkt. 1].

32 STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS
33 [FIRST REQUEST] - 1

1 2. On May 20, 2019, Trans Union filed a Motion to Dismiss the Complaint [ECF
2 Dkt.14].

3 3. On June 3, 2019, Plaintiff filed an Amended Complaint [ECF Dkt. 16].

4 4. On June 17, 2019 Trans Union filed a Motion to Dismiss the Amended Complaint
5 [ECF Dkt. 19].

6 5. Plaintiff's Response is due July 1, 2019.

7 6. Plaintiff and Trans Union have agreed to extend Plaintiff's response ten days in
8 order to allow Plaintiff's counsel, who just made their first appearance on June 27, 2019 [ECF Dkt.
9 20], to allow counsel to engage in settlement negotiations, to review the matter and to contact the
10 clients to address Trans Union pending motion to dismiss and obtain approval to file the response,
11 should settlement negotiations prove unsuccessful. As a result, both Plaintiff and Trans Union
12 hereby request this Court to further extend the date for Plaintiff to respond to Trans Union's Motion
13 to Dismiss Amended Complaint until **July 11, 2019**. This stipulation is made in good faith, is not
14

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS
[FIRST REQUEST] - 2

1 interposed for delay, and is not filed for an improper purpose.

2 IT IS SO STIPULATED.

3 Dated July 1, 2019.

4	KNEPPER & CLARK LLC	ALVERSON TAYLOR & SANDERS
5	<i>/s/ Matthew I. Knepper</i>	<i>/s/ Trevor Waite</i>
6	Matthew I. Knepper, Esq. Nevada Bar No. 12796	Kurt R. Bonds, Esq. Nevada Bar No. 6228
7	Miles N. Clark, Esq. Nevada Bar No. 13848	Trevor Waite, Esq. Nevada Bar No. 13779
8	Email: matthew.knepper@knepperclark.com	Email: kbonds@alversontaylor.com
9	Email: miles.clark@knepperclark.com	Email: twaite@alversontaylor.com
10	HAINES & KRIEGER LLC	<i>Counsel for Defendant</i> <i>Trans Union LLC</i>
11	David H. Krieger, Esq. Nevada Bar No. 9086	
12	Email: dkrieger@hainesandkrieger.com	
13	<i>Counsel for Plaintiff</i>	

14 **ORDER GRANTING STIPULATION TO EXTEND TIME**
15 **FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS**

16 **IT IS SO ORDERED.**

17 
18 UNITED STATES DISTRICT JUDGE

19 Dated: July 2, 2019.